

**SCHLANGER LAW GROUP** LLP

April 18, 2024

**VIA ECF**

Hon. Vincent L. Briccetti  
U.S. District Court - S.D.N.Y.  
300 Quarropas St.  
White Plains, NY 10601

**Re:** *Lombardo v. Trans Union, LLC, et al.* (7:20-cv-06813-VB-AEK)

Your Honor:

My firm is counsel to Plaintiff Lisa Lombardo in the above-referenced action. I write to provide a status update regarding this matter. As the Court is aware, the parties attended a second, private mediation on January 15, 2024, before the Hon. Gregory P. Holder (ret.), at which the core deal terms for a settlement between Plaintiff and Chase were agreed upon by the parties and their counsel. Accordingly, the parties filed a Notice of Settlement on January 17, 2024, advising the Court that the parties had reached a settlement and that they were working on settlement documents. ECF 214.

After extensive back and forth with opposing counsel regarding certain language in the settlement agreement (which counsel resolved), I provided a copy of the proposed final settlement agreement to Ms. Lombardo on March 18, 2024, with the expectation that finalization of the settlement would occur shortly thereafter.

Recent communications with Ms. Lombardo have significantly altered this landscape, however. Following considerable written and oral communications between attorney and client regarding consummation of the settlement, I can no longer confirm at this juncture whether Ms. Lombardo intends to proceed forward with finalization of the settlement documents, nor can I confirm whether she consents to an additional meeting with Judge Holder regarding any remaining settlement language issues.

Moreover, in light of the content of recent communications with Ms. Lombardo, if the settlement is not consummated on or before May 28, 2024, it is my intent to file an attorney's lien for all unpaid legal fees and costs in this matter from inception in 2020 to date, to file a motion to withdraw as Ms. Lombardo's counsel, and to take such other measures, as appropriate, to protect my firm's rights.

To the extent that the Court wishes to discuss any of these issues with the parties and their counsel, I am of course available.<sup>1</sup>

Respectfully,

/s/Daniel A. Schlanger

Daniel A. Schlanger

cc: all counsel of record

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<sup>1</sup> Please note, however, that I am out of the office for the Jewish holidays on April 22-24 and April 29-30, and that I will be overseas on a pre-planned trip from May 13-17.